

## UNITED STATES DISTRICT COURT

for the

\_\_\_\_ District of \_\_\_\_\_

\_\_\_\_ Division

) Case No. \_\_\_\_\_

) (to be filled in by the Clerk's Office)

Tremaine Robinson Jr.

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

Robert Weisenberger

Defendant(s)

(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

U.S. DISTRICT COURT  
DISTRICT OF MASS.

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IN CLERK'S OFFICE  
FILED

## COMPLAINT AND REQUEST FOR INJUNCTION

## I. The Parties to This Complaint

## A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name

Tremaine Robinson Jr.

Street Address

c/o 16 Hallam St, Unit 1

City and County

Dorchester

State and Zip Code

MA, [02125]

Telephone Number

561-598-4696

E-mail Address

Tremaine.Robinson.01@gmail.com

## B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

## Defendant No. 1

Name	<u>Robert Weisenbar</u>
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 2

Name	<u>Merrill &amp; McGeary Attorney at Law</u>
Job or Title ( <i>if known</i> )	<u>Attorney</u>
Street Address	<u>100 State Street, Suite 200</u>
City and County	<u>Boston, Suffolk</u>
State and Zip Code	<u>MA, 02109</u>
Telephone Number	<u>617-523-1760</u>
E-mail Address ( <i>if known</i> )	

## Defendant No. 3

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

## Defendant No. 4

Name	
Job or Title ( <i>if known</i> )	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address ( <i>if known</i> )	

**II. Basis for Jurisdiction**

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

Federal question  Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

**A. If the Basis for Jurisdiction Is a Federal Question**

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

**B. If the Basis for Jurisdiction Is Diversity of Citizenship**

## 1. The Plaintiff(s)

## a. If the plaintiff is an individual

The plaintiff, (name) Tremaine Robinson Jr., is a citizen of the State of (name) Florida.

## b. If the plaintiff is a corporation

The plaintiff, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.

*(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)*

## 2. The Defendant(s)

## a. If the defendant is an individual

The defendant, (name) Merrill J. McGeary, is a citizen of the State of (name) Massachusetts. Or is a citizen of (foreign nation) \_\_\_\_\_.

b. If the defendant is a corporation

The defendant, (name) \_\_\_\_\_, is incorporated under the laws of the State of (name) \_\_\_\_\_, and has its principal place of business in the State of (name) \_\_\_\_\_.  
Or is incorporated under the laws of (foreign nation) \_\_\_\_\_, and has its principal place of business in (name) \_\_\_\_\_.  
\_\_\_\_\_.

*(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)*

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

\* 300,000.00 T.D.R.T. Damages

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the injunction or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

A. Where did the events giving rise to your claim(s) occur? On the Plaintiff's property, known as: 16 Hallam Street, Dorchester, MA, 02125.

B. What date and approximate time did the events giving rise to your claim(s) occur? On 12-21-2019, Defendant was warned by law enforcement to cease their actions and fight it in court. On 3-3-2020, Defendants receive Plaintiff's self-purified evidence with Warranty Deed, and Cease and desist letter attached. On 3-8-2021, Plaintiff is threatening to leave his property by force.

Statement Of Claim

Tremaine Robinson Jr.

Plaintiff

v.s.

Robert Weisenberger, Merrill & McGoary

Defendant 1

Defendant 2

c. Continued:

The Defendants has now threatened the Plaintiff to vacate his property due to a force sale that is void, after the property had already been sold to Plaintiff. The Defendants thought to get a constable involved to force the Plaintiff off his property by 3-10-2021 at 9:30 a.m. (There are other recorded materials available for viewing.)

An unknown letter issued against Janice Roberts

has also been attached to this complaint.

C. What are the facts underlying your claim(s)? (For example: What happened to you? Who did what? Was anyone else involved? Who else saw what happened?) The Plaintiff purchased the property on June 28, 2019 from a friend. Due to such transaction, the Defendants thought it best to extort the property from someone who no longer has possession of. The Plaintiff submitted supportive evidence the Defendant (Merrill & McGeary) that proved the Plaintiff's claims, along with Cease and desist letter. After receiving the documents, the Plaintiff's rights are now being trespassed against with criminal intentions.

#### IV. Irreparable Injury

Explain why monetary damages at a later time would not adequately compensate you for the injuries you sustained, are sustaining, or will sustain as a result of the events described above, or why such compensation could not be measured.

Because Plaintiff is being forced against his will to leave his property immediately;

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#### V. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

(A) To enforce No Trespass, (B) \$300,000 in T.D.R.T Damages, (C) Restraining Order.

Defendants chooses to violate Plaintiff's rights after had been told to Cease and desist, as also been told to not to trespass on property.

## VI. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

### A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 3-9-2021

Signature of Plaintiff

Tremaine Robinson Jr.

Printed Name of Plaintiff

Tremaine Robinson Jr.

### B. For Attorneys

Date of signing: \_\_\_\_\_

Signature of Attorney

\_\_\_\_\_

Printed Name of Attorney

\_\_\_\_\_

Bar Number

\_\_\_\_\_

Name of Law Firm

\_\_\_\_\_

Street Address

\_\_\_\_\_

State and Zip Code

\_\_\_\_\_

Telephone Number

\_\_\_\_\_

E-mail Address

\_\_\_\_\_